

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS - AUSTIN DIVISION**

**JEREMY STORY and DUSTIN CLARK,**  
*Plaintiffs,*

**v.**

**HAFEDH AZAIEZ, et al.**  
*Defendants.*

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**Civil Action No. 1:22-cv-448-RP**

**UNOPPOSED MOTION TO CONTINUE HEARING**

Plaintiff Jeremy Story herein moves this Court to continue its hearing on motions to dismiss in the instant case to a later date to enable his counsel to attend said hearing.

The hearing in question is currently set for April 25, 2024 at 9:00 am. Counsel for Plaintiff is scheduled to depose two parties in a Tarrant County District Court case, *Dowling v. Alisa Homes*, Cause No. 348-332664-22.

The undersigned initially hoped to have these depositions taken by an assisting attorney in order to allow him to attend the hearing in this case. However, this will not be possible and rescheduling the depositions or assigning a less-experienced associate attorney will severely prejudice the undersigned's client in *Dowling*.

A continuance of the April 25, 2024 hearing to May 14, 2024 or later will prejudice no party and will allow for the recently-added Homecoming Defendants' motions to dismiss to be completely briefed, making it possible for the hearing to address all live motions to dismiss in the instant case, should the Court so desire.

Additionally, Plaintiff is filing his Motion to Supplement, in which he is offering a short declaration in support of his claims. Plaintiff asserts that this Motion should be resolved concurrently with Defendants' motions to dismiss.

Lastly, a hearing on a preliminary injunction has been set for April 23, 2024, in Puerto Rico Federal Court, in *Berkey Int'l v. EPA*, 3:24-cv-01106-CVR, which involves substantial preparation that would otherwise be available for the hearing in this matter on April 25<sup>th</sup>.

This continuance is not sought for the sake of delay, but is requested to enable Plaintiff's counsel to appear on his behalf at the hearing, and that justice may be done.

Counsel for Defendants in this matter are *unopposed* to this motion and the relief sought.

### **PRAYER**

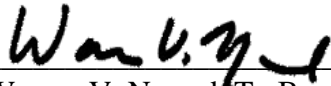
Plaintiff respectfully requests that the Court's April 25, 2024 hearing on motions to dismiss be removed from its current setting on the Court's calendar. Plaintiff further requests that the hearing be reset to May 14, 2024 or a date thereafter, or as the Court determines is reasonable.

Respectfully submitted,

/s/ Warren V. Norred

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O: 817-704-3984 / F: 817-524-6686  
**Attorney for Plaintiff Jeremy Story**

**DECLARATION OF WARREN V. NORRED** - On April 16, 2024, and pursuant to 28 U.S. Code § 1746, and under penalty of perjury under the laws of the United States of America, I declare that the facts related in this motion are true and correct.

  
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Warren V. Norred, Tx Bar: 24045094

**CERTIFICATE OF CONFERENCE** - I hereby certify that on April 16, 2024, I conferred with Kathryn E. Long, counsel for Defendants, who was not opposed to the continuance.

/s/Warren V. Norred  
Warren V. Norred

**CERTIFICATE OF SERVICE** - I hereby certify that on April 16, 2024, the foregoing Motion to Continue Hearing was served on all parties seeking service.

/s/Warren V. Norred  
Warren V. Norred